

STEPHEN ZELLER, Bar No. 265664
szeller@deconsel.com
CASEY JENSEN, Bar No. 263593
cjensen@deconsel.com
DeCARLO & SHANLEY
A Professional Corporation
533 S. Fremont Avenue, 9th Floor
Los Angeles, California 90071-1706
Telephone: 213/488-4100
Telecopier: 213/488-4180

ATTORNEYS FOR PLAINTIFFS, CARPENTERS SOUTHWEST
ADMINISTRATIVE CORPORATION and BOARD OF TRUSTEES
FOR THE CARPENTERS SOUTHWEST TRUSTS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

CARPENTERS SOUTHWEST
ADMINISTRATIVE CORPORATION, a
California non-profit corporation; and
BOARD OF TRUSTEES FOR THE
CARPENTERS SOUTHWEST TRUSTS,

Plaintiffs,

v.

PARS INDUSTRIES, INC., a California
corporation, doing business as
WOODCRAFT COMPANY; MEHDI
RAHMATI GOVARI, an individual also
known as MEHDI GOVARI; and DOES
1 through 10, inclusive,

Defendants.

CASE NO. 2:19-cv -00739-CJC-
ASx

NOTICE OF MOTION AND
MOTION FOR ENTRY OF
DEFAULT FOR JUDGMENT

Before the Honorable
Cormac J. Carney

DATE: July 8, 2019
TIME: 1:30 p.m.
CTRM: 7C

TO DEFENDANTS, PARS INDUSTRIES, INC., a California corporation, doing
business as WOODCRAFT COMPANY and MEHDI RAHMATI GOVARI, an
individual also known as MEHDI GOVARI:

PLEASE TAKE NOTICE that on July 8, 2019 at 1:30 p.m., or as soon
thereafter as counsel may be heard, in Courtroom 7C at 350 W. 1st Street, Los

1 Angeles, California, before the Honorable Cormac J. Carney, United States
2 District Judge, plaintiffs, CARPENTERS SOUTHWEST ADMINISTRATIVE
3 CORPORATION and BOARD OF TRUSTEES FOR THE CARPENTERS
4 SOUTHWEST TRUSTS, ("PLAINTIFFS"), will move the court to enter default
5 judgment in favor of plaintiffs and against defendants, PARS INDUSTRIES, INC.,
6 a California corporation, doing business as WOODCRAFT COMPANY, and
7 MEHDI RAHMATI GOVARI, an individual also known as MEHDI GOVARI,
8 (collectively referred to as "DEFENDANTS"), for damages as requested in the
9 first, second, third and fourth claims for relief, and for such other and further relief
10 as the Court deems proper on the ground that the default has been entered against
11 DEFENDANTS for failure to answer or otherwise defend and that PLAINTIFFS
12 have established their entitlement to the relief requested.

13 This motion is based upon the memorandum of points and authorities and
14 declarations filed herewith, upon the papers and pleadings on file herein, and upon
15 such further oral and documentary evidence as the court may require at the time of
16 hearing of this motion.

17
18 DATED: 6/3/2019

DeCARLO & SHANLEY
A Professional Corporation

19
20
21 By: 

STEPHEN ZELLER
Attorneys for Plaintiffs

PROOF OF SERVICE (By Mail)
(Carpenters v. Pars Industrial, Inc., etc.,)
(USDC Case No. 2:19-cv-00739-CJC-ASx)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action. My business address is: DeCARLO & SHANLEY, a Professional Corporation, 533 S. Fremont Avenue, Ninth Floor, Los Angeles, California 90071-1706.

On June 4, 2019, I served a copy of the foregoing document, described as: **NOTICE OF MOTION AND MOTION FOR ENTRY OF DEFAULT FOR JUDGMENT**

defendants, addressed as follows:

Pars Industries, Inc.,
a California corporation, dba
Woodcraft Company
8594 Siempre Viva Road, #C
San Diego, CA 92154

Mehdi Rahmati Govari, an indiv.
aka Mehdi Govari
8594 Siempre Viva Road, #C
San Diego, CA 92154

in said action, by placing [X] a true copy thereof, [] an original enclosed in sealed envelope(s).

[X] **(BY DEPOSIT FOR COLLECTION)** I am readily familiar with the firm's practice for the collection and processing of correspondence for mailing. Under that practice, mail would be deposited with the United States Postal Service on that same day with postage thereon fully prepared at Los Angeles, California in the ordinary course of business. Following ordinary business practices, I caused such envelope(s), with postage thereon fully prepaid to be placed for collection and mailing.

I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

Executed on June 4, 2019, at Los Angeles, California.

[X] **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.



Lucy J. Moure-Pasco